

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Plaintiffs,

v.

National Football League and
NFL Properties LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

Civ. Action No. 14-00029-AB

NOTICE OF JOINDER

The National Football League and NFL Properties LLC (collectively, the "NFL Parties") join in and support the arguments made by Co-Lead Class Counsel in its Opposition to the Motion for Reconsideration by X1Law of its Motion to Determine Proper Administration of Claims Under the Settlement Agreement (ECF No. 8949).

X1Law's motion for reconsideration is an improper attempt to re-litigate its prior motion, which this Court appropriately denied as improper. (ECF No. 8883.) In its decision rejecting X1Law's motion as premature, this Court admonished X1Law that its clients must proceed

through the Claims Administration process, including the proper appeal process, and that it should not attempt to circumvent those Court-approved processes by directly petitioning the Court. (*Id.*) Nonetheless, X1Law flouted this Court's direction by filing yet another motion seeking the same relief and ignoring the relevant standard, which provides that motions for reconsideration should only be granted under exceptional circumstances and where there is "(1) an intervening change in the controlling law; (2) the availability of new evidence . . . ; or (3) the need to correct a clear error of law or fact or to prevent manifest injustice." *Max's Seafood Cafe ex rel. Lou-Ann, Inc. v. Quinteros*, 176 F.3d 669, 677 (3d Cir. 1999). No such circumstances exist here.

For these reasons, and those set forth in Co-Lead Class Counsel's opposition brief, X1Law's Motion for Reconsideration should be denied.

Dated: November 27, 2017

Respectfully submitted,

/s/ Brad S. Karp
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